

Attorney General
United States of America

Attorneys for the United States of America

DISTRICT OF NEVADA

Defendant.

**STIPULATED MOTION FOR
PRIVACY ACT PROTECTIVE ORDER**

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1 **Definitions:**

2 1. “Confidential Information” means any discovery material that the producing party
3 or protected person reasonably believes not to be in the public domain and reasonably believes
4 contains information pertaining to individuals and/or records as those terms are defined in 5
5 U.S.C. § 552a(a).

6 2. “Disclosed” is used in its broadest sense and includes directly or indirectly shown,
7 divulged, revealed, produced, described, transmitted or otherwise communicated in whole or in
8 part.

9 3. “Discovery” is defined as the term is used in the Federal Rules of Civil Procedure.

10 4. “Discovery Material” means any documents, answers to interrogatories, responses
11 to requests for admission, deposition testimony, deposition transcripts and exhibits, other
12 responses to requests for information and/or other written information whether produced
13 voluntarily or involuntarily in the course of discovery in this matter.

14 5. “Document” is defined as the term is defined in Rule 34(a) of the Federal Rules of
15 Civil Procedure.

16 6. “Counsel” means the counsel of record in this matter and their law firms/agencies
17 as well as other attorneys or consultants employed by or retained by such law firms.

18 **Permissible Uses of Confidential Information**

19 The use of any confidential information obtained in this action shall be limited to use in
20 connection with this action (including any appeal) and shall not be disseminated or utilized in any
21 other administrative or judicial proceeding. Nothing in this order shall prevent the parties from
22 disclosing information to consultants, experts, litigation support services, court personnel,
23 personnel employed by counsel and/or their firms, authors of protected documents, witnesses or
24 potential witnesses in this action.

25 By producing documents subject to this Order, Defendant does not waive any objections
26 to any future use of these documents that may be made by any party, either at trial or in any other
27 proceeding.

1 Upon conclusion of this action (including any appeals), all copies of documents released
2 under this Order, excepting exhibits entered into evidence, shall be returned within 30 days, to
3 counsel for Defendant.

4 This Order shall not prevent or in any way limit or impair the right of the United States to
5 disclose to any agency or department of the United States, or any division of such agency or
6 department, confidential information relating to any potential violation of law or regulation, or
7 relating to any matter within that agency's jurisdiction, nor shall anything contained in this Order
8 prevent or in any way limit or impair the use of any confidential information by an agency in any
9 proceeding relating to any potential violation of law or regulation, or relating to any matter within
10 that agency's jurisdiction.

11 Respectfully submitted this 26th day of February, 2018.

12 RICHARD HARRIS LAW FIRM

JEFFERSON B. SESSIONS
Attorney General

ELIZABETH A. STRANGE
First Assistant United States Attorney
District of Arizona

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16 /s/ Samantha A. Martin
SAMANTHA A. MARTIN
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18 *Attorneys for Plaintiff*

/s/ Katherine R. Branch
KATHERINE R. BRANCH
Special Attorney
Attorneys for United States of America

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22 IT IS SO ORDERED:



23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 2-26-2018
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2 **PROOF OF SERVICE**

3 I hereby certify that all parties were served with the **STIPULATED MOTION FOR**
4 **PRIVACY ACT PROTECTIVE ORDER** on this date via the Court's Electronic Case Filing
system unless specified otherwise below.

5 Dated this 26th day of February, 2018.

6 /s/ Katherine R. Branch
7 United States Attorney's Office
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